

## Remarks

Claims 1-29 are at issue. Claims 1-12 stand rejected under 35 USC 112, first paragraph as failing to comply with the enablement requirement. Claims 1-11, 13-15, 17-23 & 25-29 stand rejected under 35 USC 103(a) as being unpatentable over by Blinn et al (USPN 5897622) in view of Alexandra (USPN 6,732,331). Claims 12 and 16 are objected to as being dependent upon an allowable base claim.

### 35 USC 112 first paragraph

Note, that just because it is traditional for templates to be static does not mean that the application is not enabled. Figure 2 shows that the template 44 contains several dynamic data generation modules (DDGM) 46, 48, 50. Page 8, lines 15-18 of the present application point out that a DDGM is also referred to in the document as BizComponent (BizComp) and that many of examples are in the provisional patent application. Figure 9 explains how a BizComponent performs its steps and Figure 8 explains how the BizComponent is called by the template (BizDoc). How a DDGM is used in a template is clearly and extensively explained in the application.

MPEP section 2164.04 makes it clear that the burden is on the Examiner. Since there is several examples in the specification that explain how the DDGM is placed in the template, the specification must be taken as being in compliance with enablement requirement. The rejection of claims 1-12 under 35 USC 112 first paragraph must be withdrawn.

### 35 USC 103

Both of the references cited by the Examiner are concerned with presenting HTML pages. The present application converts data from one structured data format to another structured data format. How the data is presented for viewing is irrelevant to the present application. **Clearly, HTML does not group data with its context.** HTML groups content with how it is to be presented. No where does the present application discuss how the data is presented. Until the Examiner can find a reference that shows how data is convert from one data format, such as a relational database format, to another format, such as an XML format, **the claims must be allowed.**

### Claims

Claim 1 requires a first and second hierarchical data scheme and the claim defines a hierarchical data scheme as a scheme that groups data and its context. This definition can be found in the specification at page 2, lines 19-24. Note that the list of examples of hierarchical data structures does not include HTML as used by Blinn et al. Blinn converts database information into an HTML page. HTML is a presentation or display language not a data structure. As a result HTML combines a tag with data, however the tag explains how the data is presented on a computer screen, not the context of the data. For instance, **<bold> \$9.99</bold>** tells the browser (client) to bold the data, e.g., **\$9.99**, but it does not tell you that \$9.99 is a price. Clearly, Blinn does not covert data in a first hierarchical data scheme to a second hierarchical data scheme.

The Examiner states that Alexander has a second hierarchical data scheme. Alexander is just a method of presenting and altering the data in a single data scheme. The data is presented on a web page, HTML, and may be altered. The templates discussed in Alexander, see Col. 7, lines 15-30, are just HTML templates for displaying the data. The data is not converted from a relational data base format to a an XML format, for instance. Alexander takes data in an XML format, for instance, displays it on a web page and allows the data to be altered, but all the data is still in the XML format.

Neither reference has a dynamic data generation module. Both references are just concerned with displaying the data.

Claim 1 is allowable.

Claims 2-3, 8, & 10-11 are allowable as being dependent upon an allowable base claim.

Claim 4 requires a developer module for creating the dynamic data generation module. Neither, Blinn or Alexander has a developer module. The Examiner points to item 18 of Alexander. Item 18 is concerned with creating a form of how the data will appear in on a screen. It has nothing to do with converting data in a first structured data format into a second structured data format. Claim 4 is allowable.

Claim 5 requires the template to be an eXtensible Markup Language (XML) document. A computer search of Blinn shows that he never mentions XML or extensible markup language. Clearly Blinn does not have an XML template. The Examiner points to Alexander Col.s 10-11, lines 65-15. Alexander is describing an XML template that defines a form for displaying the data. It does not describe a second hierarchical data scheme. Claim 5 is allowable.

Claim 6 requires the template have an XML document type definition. The Examiner points to Alexander Col.s 10-11, lines 65-15. Alexander is describing an XML template that defines a form for displaying the data. It does not describe a second hierarchical data scheme. Claim 6 is allowable.

Claim 9 further defines the group of items that fit the second hierarchical data scheme. In the Examiner's analogy to Blinn or Alexander the second hierarchical data structure would be the HTML. HTML is not in the list of claim 9. Claim 9 is clearly allowable over the prior art.

Claim 13 defines a hierarchical data scheme as a scheme that groups data and its context. This definition can be found in the specification at page 2, lines 19-24. Note that the list of examples of hierarchical data structures does not include HTML as used by Blinn et al. Blinn converts database information into an HTML page. HTML is a presentation or display language not a data structure. As a result HTML combines a tag with data, however the tag explains how the data is presented on a computer screen, not the context of the data. For instance, **<bold> \$9.99</bold>** tells the browser (client) to bold the data, e.g., **\$9.99**, but it does not tell you that \$9.99 is a price. Clearly, Blinn does not covert data in a first hierarchical data scheme to a second hierarchical data scheme.

The Examiner states that Alexander has a second hierarchical data scheme. Alexander is just a method of presenting and altering the data in a single data scheme. The data is presented on a web page, HTML, and may be altered. The templates discussed in Alexander, see Col. 7, lines 15-30, are just HTML templates for displaying the data. The data is not converted from a relational data base format to a an XML format, for instance. Alexander takes data in an XML format, for instance, displays it on a web page and allows the data to be altered, but all the data is still in the XML format.

Neither reference has a dynamic data generation module. Both references are just concerned with displaying the data. Claim 13 is allowable.

Claims 14 & 17 are allowable as being dependent upon an allowable base claim.

Claim 15 requires a data mapping between the two hierarchical data schemes. The Examiner points to a syntax tree (FIG. 4) of Blinn. A syntax tree is not a hierarchical data scheme. The short description of the figure makes it clear that the figures just shows the similarity between the syntax tree and the template and does not show a mapping between them. Claim 15 is allowable

Claim 18 requires an extensible markup language template and a data map. The Examiner points to a syntax tree (FIG. 4) of Blinn. A syntax tree is not a hierarchical data scheme. The short description of the figure makes it clear that the figures just shows the similarity between the syntax tree and the template and does not show a mapping between them.

The Examiner points to Alexander Col.s 10-11, lines 65-15 as showing the template. Alexander is describing an XML template that defines a form for displaying the data. It does not describe a second hierarchical data scheme.. Claim 18 is allowable.

Claims 19-22 & 25 are allowable as being dependent upon an allowable base claim.

Claim 23 requires receiving a screen having the list of elements and a list of metatags. The Examiner points to Blinn Col. 8 & 9. This section just discusses how to display information on a web page. It does not display a list of elements from one source and a list of metatags from another source. Claim 23 is allowable.

Claim 24 requires displaying a static element in a first color and a dynamic element in a second color. Every reference to color in Povilus is to the choice of colors the purchaser has for a product. This is not even remotely related to the present application. Claim 24 is allowable.

Claim 26 requires an extensible markup language template and a data map. The Examiner points to a syntax tree (FIG. 4) of Blinn. A syntax tree is not a hierarchical data scheme. The short description of the figure makes it clear that the figures just shows the similarity between the syntax tree and the template and does not show a mapping between them.

The Examiner points to Alexander Col.s 10-11, lines 65-15 as showing the template. Alexander is describing an XML template that defines a form for displaying the data. It does not describe a second hierarchical data scheme. Claim 1826 is allowable.

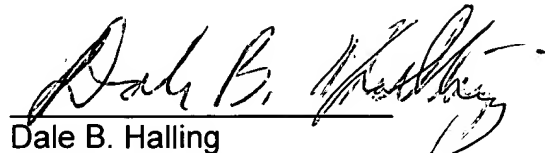
Claims 27-29 are allowable as being dependent upon an allowable base claim.

Prompt reconsideration and allowance are respectfully requested.

Respectfully submitted,

(Vandersluis)

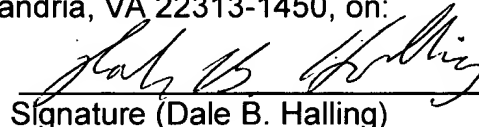
By



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I hereby certify that an Amendment is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner of Patents and Trademarks, P.O. Box 1450, Alexandria, VA 22313-1450, on:

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